

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

MINDY WELFORD,	)	
	)	
Plaintiff,	)	Civil Action No.
	)	
v.	)	1:20-cv-00151-LG-RPM
	)	
EQUIFAX INFORMATION SERVICES,	)	
LLC, a Georgia limited liability company,	)	
and PROFESSIONAL COLLECTION	)	
SERVICE, INC.,	)	
	)	
Defendants.	)	

**EQUIFAX INFORMATION SERVICES LLC'S MOTION FOR SUMMARY  
JUDGMENT AND JOINDER IN DEFENDANT  
PROFESSIONAL COLLECTION SERVICE, INC.'S  
MOTION FOR SUMMARY JUDGMENT**

COMES NOW, Defendant Equifax Information Services LLC (“Equifax”), by counsel, and hereby joins in the Motion for Summary Judgment (“Motion”) filed by Defendant Professional Collection Service, Inc. (“PCS”) on October 30, 2020 (Doc. No. 20), and hereby incorporates by reference the Motion and its accompanying Brief, Exhibits and Statement of Uncontested Facts as though fully set forth herein by Equifax and, further, hereby moves for summary judgment pursuant to Fed. R. Civ. P. 56 as to each of the claims raised by Plaintiff, Mindy Welford, against Equifax. Case law and the undisputed facts as set forth in PCS’s Motion, Brief, Exhibits and Statement of Uncontested Facts, and as set forth in Equifax’s accompanying Memorandum of Authorities in Support of this Motion, demonstrate that Plaintiff’s claims against consumer reporting agency Equifax should be dismissed for many of the same reasons that Plaintiff’s claims against data furnisher PCS should be dismissed.

WHEREFORE, Equifax respectfully requests that the Court issue an Order granting the

summary judgment in Equifax's favor on all counts of Plaintiff's Complaint. Equifax further requests that this Court grant all other and further relief to Equifax as this Court deems appropriate.

Respectfully submitted this 9<sup>th</sup> day of November, 2020.

EQUIFAX INFORMATION SERVICES LLC

By Its Attorneys,

DONAHOO LAW FIRM, PLLC

By : /s/ Price W. Donahoo  
Price W. Donahoo (MSB #103223)

OF COUNSEL:

**DONAHOO LAW FIRM, PLLC**

732 Magnolia Street (39110)  
Post Office Box 1549  
Madison, Mississippi 39130-1549  
Telephone: (601) 213-0883  
Facsimile: (601) 368-8672  
[price@donahoolawfirm.com](mailto:price@donahoolawfirm.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed the foregoing document via the Court's electronic filing system, which sent notification of such filing to the following counsel of record:

Jacob Richard Burns  
JACOB R. BURNS, ATTORNEY AT LAW  
P. O. Box 2159  
Pascagoula, MS 39569-2159  
228-623-5676  
Email: [jacob.richard.burns@gmail.com](mailto:jacob.richard.burns@gmail.com)  
ATTORNEYS FOR PLAINTIFF

H. Richmond Culp , III  
MITCHELL, MCNUTT & SAMS, PA - Tupelo  
P. O. Box 7120  
105 South Front Street  
Tupelo, MS 38802-7120  
662/842-3871  
Fax: 662/842-8450  
Email: [rculp@mitchellmcnutt.com](mailto:rculp@mitchellmcnutt.com)  
ATTORNEYS FOR DEFENDANT PROFESSIONAL COLLECTION SERVICE, INC.

DATED: November 9, 2020

*/s/ Price W. Donahoo*  

---

PRICE W. DONAHOO (MSB #103223)